

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY)	
KENTUCKY, INC. FOR 1) AN ADJUSTMENT OF)	
THE ELECTRIC RATES; 2) APPROVAL OF NEW)	CASE NO.
TARIFFS; 3) APPROVAL OF ACCOUNTING)	2019-00271
PRACTICES TO ESTABLISH REGULATORY)	
ASSETS AND LIABILITIES; AND 4) ALL OTHER)	
REQUIRED APPROVALS AND RELIEF)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO NORTHERN KENTUCKY UNIVERSITY

Northern Kentucky University (NKU), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on January 17, 2020. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

NKU shall make timely amendment to any prior response if NKU obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which NKU fails or refuses to furnish all or part of the requested information, NKU shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, NKU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Brian C. Collins (Collins Testimony), page 9, lines 3–7. If the Commission approved a revenue requirement that is less than the revenue requirement proposed by Duke Energy Kentucky, Inc., (Duke Kentucky), explain whether NKU would allocate this reduced revenue amount in the same manner as proposed by Duke Kentucky.

2. Refer to the Collins Testimony, page 13, lines 6–18. Confirm that the proposed alternative major storm reserve account is for analytical purposes only and not for recovery purposes. Explain how this is different from how Duke Kentucky currently accounts for major storm expenses and the calculation for the amount included in base

rates. Confirm that major storm expenses can vary significantly from year to year and a short-term review may not be reflective of long-term trends.

For 

Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED JAN 03 2020

cc: Parties of Record

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